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CLERK, U.S. DISTRICT COURT
FOR THE WESTERN DISTRICT
OF PENNSYLVANIA

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

Name and address of Plaintiff:

William P JACKSON 30458
950 Second Ave ACT
PGH PA 15219

v.

Full name, title, and business address
of each defendant in this action:

1 Warden Orlando Harper
950 Second Ave ACT
PGH PA 15219

2 Chief Deputy David Zetwo
950 Second Ave ACT
PGH PA 15219

Use additional sheets, if necessary
Number each defendant.

3 Deputy Laura Williams
950 Second Ave ACT
PGH PA 15219

4 Major Adam Smith
950 Second Ave ACT
PGH PA 15219

5 Detention Mr Wilson
950 Second Ave ACT
PGH PA 15219

6 SGT Geiber
950 Second Ave ACT
PGH PA 15219

7 CAPT FRANK
950 Second Ave ACT
PGH PA 15219

Plaintiff brings this action against the above named and identified defendants on the following cause of action:

I. Where are you now confined? Allegheny CO Jail
What sentence are you serving? Pre Trial detainee
What court imposed the sentence? N/A

II. Previous Lawsuits

A. Describe any and all lawsuits in which you are a plaintiff which deal with the same facts involved in this action. (If there is more than one lawsuit, describe the additional lawsuits on another piece of paper, using the same outline.)

1. Parties to this previous lawsuit

Plaintiffs N/A

Defendants N/A

2. Court (if federal court, name the district; if state court, name the county) and docket number

N/A

3. Name of judge to whom case was assigned N/A
4. Disposition (For example: Was the case dismissed? Was it appealed? Is it still pending?)
N/A
5. Approximate date of filing lawsuit N/A
6. Approximate date of disposition N/A

B. Prior disciplinary proceedings which deal with the same facts involved in this action:

Where? N/A

When? N/A

Result: N/A

III. What federal law do you claim was violated? _____

IV. Statement of Claim

(State here as briefly as possible the facts of your case. Do not give any legal arguments or cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Use as much space as you need. Attach extra sheet if necessary.)

- A. Date of event: 5-21-20 To Present
- B. Place of event: Allegheny CO Jail
- C. Persons involved--name each person and tell what that person did to you: MATOR SMITH IS THE SEGREGATION MATOR. HE PLACED ME IN THE RHU CHANGED MY STATUS FROM PC PROTECTIVE CUSTODY STATUS TO ADM CUSTODY. PER PRISON POLICY INMATES WITH SEGREGATIONS HAVE TO BE SWITCHED OUT EVERY 30 DAYS TO ENSURE FAIRNESS. PER MATOR SMITH AND CAPT FRANK I WAS SWAPPED WITH MY SEGREGATION AND STAYED IN THE RHU FOR 3-3 1/2 MONTHS BEFORE BEING MOVED TO N.E.O.C.C. I AM NOW BACK SINCE 3-9-21 AND IMMEDIATELY PLACED ON AC STATUS. I HAVE NO INFRACTIONS. I AM ONLY ENTITLED TO 2 hr recreation per day. I SHOWER 3x per week A HAIR CUT EVERY OTHER MONTH 22 hrs per day in my cell CAUSING ATYPICAL AND SIGNIFICANT HARDSHIP. I CAN'T GO TO RECREATION DUE TO INMATES THROWING URINE AND FECS ON OR AT ME MY STATUS WAS CHANGED BY MATOR SMITH DUE TO MY COMPLAINTS AGAINST DEPUTY WILLIAMS THE MEDICAL DIRECTOR OVER BEING DENIED PREVIOUS DENTAL TREATMENT. RETALIATORY CONDUCT. CAPT FRANK ALSO RETALIATED DUE TO MY PREVIOUS COMPLAINT ABOUT THE JAIL

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- ③ Stating I refused CT and All my charges were waived That I proved WAS A Lie. I am on AC STATUS without A misconduct, investigation NO WRITTEN or Verbal Reason why. When I see PRC Major Smith 4x Plus he Just Says I'll Think ABOUT letting you out when Theres Room But Theres Room EveryTime he Says This. A PRC Hearing is Suppose To Be more Than A mere Fluff. I am A Pretrial Detainee And Should not Be punished per The US Constitution. And Am ENTITLED To A WRITTEN NOTICE OF The Reason I AM A-C STATUS. Equal protection clause. my Separations are getting Full Rec, Hair cuts weekly, Access To The gym Basketball, Hand Ball, TV, inmate Phones, Hot water Interaction with others. Policy was used To place me in The R.HU stating inmates with Separations will Be Swapped out Every 30 days To Ensure Fairness ITS Been over 4 months and I havent Been Swapped Back.
- ① I Have 3 Teeth That need Fillings/Crowns and All Are causing severe pain. 2 are Front Teeth That The Dentist AT N.E.O.C. and Indiana County Jail stated can Be Fixed prior To coming Here 3-9-21 when I got in inmate I Told The medical Dept of my pain and need For Treatment and was Told we'll get it Fixed on 3-12-21 after complaining multiple Times To multiple people The Dentist came To see me. "Mr Wilson" and He stated yeah They can Be Fixed But 2 need Crowns. maybe you can get Them Fixed AT Another Jail. we dont Do Them Here. per The US Const Eight Amend The court reasoned That Since Incarceration denied prisoners The ABILITY To care For Themselves The Government HAS AN obligation To provide care (dental) medical For US!
- ② When Transferred Aug 2020 my property: Legal work was Suppose To Be sent with me for some Reason mine was left Behind. NECC called ABOUT IT. I spoke directly To Chief Deputy Zetwa on A weekly Basis who stated it will Be Here until you get Back in March For your Thinks. 3-9-21 I came Back There are 2 Transcripts I paid For That are missing. Shoes 20⁰⁰, Hygiene Total 40⁰⁰, clothing Total OF 470⁰⁰ Transcripts Total 120⁰⁰. 2 Radios, 50⁰⁰ Envelopes Batteries and Bowls and cups Total OF 40-500 Estimate Value OF 400⁰⁰ +

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- Sgt Gerber was Holding my property per Deputy Zetlow. Deputy Zetlow said He would Hold it.
- ③ In Approx July 2020 Chief Deputy Zetlow Called me To level 1-m To Talk To me when I got There he was With A County Detective And We Began To Talk AT A point Chief Zetlow Started saying you The plaintiff got All kinds of money. I said no I don't. he Then said yes you do. From That safe From The Burglary your charged With I noticed The audio and Video From The Interview Room was on so. I Told Chief I Am Represented By Counsel. And we Shouldn't Be discussing my pending legal matters. And The audio and Video Is on Sir. he Just laughed.
- ④ Chief Zetlow Was Acting As A Agent For The State Under The State Actor Law Violating my Right To Counsel By Questioning me Without my counsel present. Not Telling me The audio and Video were on.

COMPLAINT

Cease and Desist Request

Plaintiff: William P Jackson 30458, Brings This Action Under The United States Constitution Civil Rights Action First, Second, Fourth, Fifth Eighth and Fourteenth Amendment, Deliberate Indifference, Failure To Act Civil and Unusual punishment, Atypical and Significant Hardship Retaliatory conduct Intimidation and Wanton or Pain, Blatant Disregard For A Serious medical/dental need, Right To Due process, Equal protection clause. Plaintiff seeks Injunctive and declaratory Relief All Attorney Fees And Compensatory and punitive Damages From Warden Harper, Chief Zetlow Deputy Williams, Major Smith, Capt Frank, Sgt Gerber, Major Smith, Dentist Wilson And The Allegheny Co Jail et al

- I. Jurisdiction of Venue, The Court Has Jurisdiction over Plaintiffs Federal Law claims pursuant To The United States Constitution First Second, Fourth Fifth Eighth and Fourteenth Amendments.
- II. Plaintiff has complied with All applicable Grievance procedures
- III The Amount of Damages Requested Exceeds \$75000 per Defendant Elusive of Interests and Costs.
- III The Defendants Transact Within The Commonwealth of Pennsylvania

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~~OF~~ ~~FURTHERMORE~~ Defendants Civil Rights Violations And
Practices were committed within The Commonwealth of PA.

Parties

① Plaintiff is a male Prisoner who resides at The Allegheny Co Jail
in The Commonwealth of PA

② on or about May 2020 Plaintiff complained about Being Retaliated
Against for his Good Faith use of The Inmate Grievance System and
Being Threatened with Being Placed in The RHU. Plaintiff on
or about 3-9-21 complained about severe pain due to 3 Teeth
Hurting 1 The whole Filling Fell out leaving A Sharp Exposed
Front Tooth causing severe pain when Eating or Drinking and
2 other Teeth That need Treatment.

③ Plaintiff Requested written or Verbal Reasons why he is again
Placed on AC Status in The RHU and Not on GF where
he was for 12 months with no Infractions. and/or swapped
out per policy after 30 days.

④ on or about 3-10-21 Plaintiff's Family spoke to Chief Zetwo who
informed them they found my missing property and it will be sent
up Friday 3-12-21. wasn't done.

⑤ in or about July 2020 Plaintiff was questioned by Chief Zetwo
on a pending legal matter while he is represented by Counsel
Chief Zetwo was acting as a Agent for The State.

⑥ From Jan 2020 until Present Plaintiff complained about Dental
Treatment and Major Smith's Policy's which resulted in several
Assaults on GF. After these legitimate complaints against Major
Smith and Deputy Laura Williams (who are companions) Plaintiff
was sent to The RHU and Status switched from J.C Status to
AC Status. Stating Every 30 Days Separations will be switched out
per policy. Plaintiff has been in The RHU 4-4 1/2 months. No
written or Verbal Reason NO PRC Hearing to Determine His
Status.

⑦ Captain Frank who Plaintiff complained about not doing her Duty's as
Plea Coordinator. Retaliated by conspiring with Major Smith and Deputy
Williams to place me in The RHU with not even A 48 hr lock in let alone
A misconduct in 19 months.

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8 Chief Deputy Zetwa and Warden Harper Have Been made AWARE OF This Numerous Times and Failed To ABATE IT AS Direct Supervisors Learned OF The Violation OF my Rights and Failed To do anything TO Fix The Situation,

⑧ Being Direct Supervisors Created The policy or custom Allowing or encouraging The illegal ACTS; or

⑨ The Supervisors Failed TO Adequately Train or Supervise his Subordinates

FIRST COURT

⑨ paragraphs 1-8 Are Incorporated herein reference

⑩ The ACTS Failure To ACT AND Policy's OF Defendants Set Forth Above CONSTITUTE Deliberate Indifference, Retaliatory conduct, cruel and unusual punishment, Atypical and Significant Hardship, Failure To ACT Failure To Train Subordinates, Equal protection clause, Due process, STATE ACTION LAW A Wanton INFLICTION OF PAIN. Under The UNITED STATES CONST First, Second, Fourth Fifth Eighth Fourteenth Amendment

⑪ RELIEF Requested

① For Each OF The ABOVE Claims Plaintiff Respectfully Requests That This Court Grant Judgement in his Favor Against Defendants and Award Him Relief Included But NOT Limited To The Following.

② Injunctive Relief Directing Defendants To cease and desist any and All Retaliation, Release him From AC STATUS, Repair his serious Dental Needs crown/fillings. Replace his Stolen Legal work/property

③ Cease and desist any Further Denial OF Due process, Dental care Due process To A PRC Hearing. Retaliatory conduct. placed Back ON GF.

④ Money Damages For pain and Suffering For 4 1/2 months OF Being on AC STATUS in The RHU, 2 1/2 months OF Denied Dental care And still ongoing. 250⁰⁰ per Defendant per day ON Individual and Official Capacity

⑤ Reimbursement OF All Expenses and Financial losses Plaintiff has Incurred Copy's, mail AS A result OF Defendants ACTIONS.

⑥ Declaratory Relief Declaring The ACTS AND Practices OF Defendants To Be IN Violation OF The UNITED STATES CONSTITUTION First, Second Fourth Eighth and Fourteen Fifth Amend

⑦ Reasonable ATTORNEY Fees

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16. Compensatory Damages

17. Punitive Damages

18. Such other relief as this court shall deem appropriate

20. When a inmate files a case the court should not dismiss the complaint unless he fails to state a claim or constitutional violation

Respectfully Submitted
Plaintiff William P Jackson 30458

MOTION TO Provide Copies Due To Jail Denying Them

1. Plaintiff is being retaliated against. Refused sick calls requests told the jail don't provide copies without court order. Denied a hair cut, trimmers to shave. Can't go to yard/cages due to staff starting rumors with the other inmates who have tried to spit on plaintiff throw urine and feces on plaintiff

2. Plaintiff respectfully requests a order to have the jail provide copies to plaintiff and a copy of this original so I can get them to comply with the courts instructions or court provide them this is my only copy and I need a copy Thanks in advance

Respectfully Submitted

William P Jackson
30458

- V. Did the incident of which you complain occur in an institution or place of custody in this District?
If so, where?

Allegheny co Jail

and answer the following questions:

- A. Is there a prisoner grievance procedure in this institution?
Yes (☒) No (☐)

- B. Did you present the facts relating to your complaint in the state prisoner grievance procedure?
Yes (☒) No (☐)

- C. If your answer is YES,

1. What steps did you take? Requests, Grievances denied Talked To Chief Zetwa
MAJOR Smith Capt Young,
2. What was the result? Denied

- D. If your answer is NO, explain why not: _____

- E. If there is no prison grievance procedure in the institution, did you complain to prison authorities?
Yes (☐) No (☐)

- F. If your answer is YES,

1. What steps did you take? _____
2. What was the result? _____

- VI. Relief

State briefly exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes.

Please See 6 page Summary

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT.

3-16-21
(Date)

William P Jackson
(Signature of Plaintiff)